

Video Relay Service

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Summary of Meetings with FCC Commissioners

- Review Impact of Interim VRS Rates
 - Bureau's announcement (June 30th)
 - Impact on Consumer, Interpreter and Provider
 - Occupancy and Utilization
 - Current Cost Recovery Picture
 - How Expense is Allocated
- Understanding the FCC's Goals with VRS
- Review Legal Interpreting Petition
- Conclude with Questions and Discussion
- Overall decline in quality of service
- Limited hours of service (previously 24/7 now 6AM-12PM CST)
- Longer answer times (Does not meet daily 85/10 goal)
- Quality of interpreters declining (experienced VIs leaving the profession)
- Repeated communications during a VRS call due to increased interpreter error as a result of fatigue and in-experience

Interpreter Impact of the Interim VRS Rate

- Significant physical and mental fatigue, due to decreased or no recovery time between calls directly related to occupancy
 - High Occupancy (often approaching 80% during peak periods from 10AM to 5PM daily)
 - No Breaks
 - No Back Up or Floater Support
 - Eye Strain
 - Muscle Fatigue
 - Mental Fatigue
- Interpreters leaving for safe and more comfortable work in the field (community interpreting)

Cost Recovery at 50% Occupancy for VRS

- \$7.75 Per Minute Interim Rate

- **53% Average Occupancy (Total Work Time)**
- **70% Average Utilization (Amount of Work Time that is Billable)**
- **$\$7.75 \times 53\% \times 70\% = \2.875 (What we are able to bill per minute)**
- **Generates \$172.515/Hour - Per Position to Cover**
 - Labor (Interpreters at \$45-\$50/hour, Supervisor, Trainer and Floater)
 - Multiple Facilities (7 Small Centers Nationwide)
 - Marketing
 - Administration
 - Technology
 - At very low call volumes (5,700 Billable Minutes/Day)

Cost Recovery at 35% Occupancy for VRS

- **\$7.75 Per Minute Interim Rate**
- **35% Average Occupancy (Total Work Time)**
- **70% Average Utilization (Amount of Work Time that is Billable)**
- **$\$7.75 \times 35\% \times 70\% = \1.898 (What we are able to bill per minute)**
- **Generates \$113.925/Hour - Per Position to Cover**
 - Labor (Interpreter, Supervisor, Trainer and Floater)
 - Multiple Facilities (7 Small Centers Nationwide)
 - Marketing
 - Administration
 - Technology
 - At very low call volumes (5,700 Billable Minutes/Day)

VRS Daily Call Volumes Interim Rate Impact on Expense

- Reduced Research and Development
- New Switch Purchase Cancelled
- Ability to Recover Costs in Question
 - Technology Investment
 - Center Closures
 - Contract Termination Costs
 - Long Term Impact of Increased Occupancy

FCC's Goals for VRS

- Functional Equivalency
- Answer Speed
- 24/7 365 Days Per Year

- Impact of Rate on Access

Legal Interpreting Petition

- **Conflict between State and Federal Law.**
- **Consumers need legal protections of appropriately credentialed and legally certified interpreters handling legal calls.**
- **Using VRS is inappropriate and very much compromises the rights of the consumer. Some examples include the extra time needed to prepare communications (vs. TRS need to initiate calls quickly), need for interpreters to attest to accuracy in court cases (vs. TRS call confidentiality rules).**
- **CSD's petition supported by comments filed by TCDHH, HOVRS, RID, and TDI.**
- **FCC seems to be leaning toward pre-empting State Law and waiving liability of interpreter for processing these calls, requiring VRS to process the calls. Releasing the interpreter from legal liability for processing this type of call still places the consumer at risk. CSD believes that it would be unfair to place burden on deaf consumer. This is the reason that the state laws guaranteeing qualified interpreters were enacted in the first place.**